



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

DEC 16 2011

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Bill Evans, CEO and President
AmeriPride Services Inc.
10801 Wayzata Boulevard
Minnetonka, MN 55305

Re: Clean Air Act Reporting Requirement

Dear Mr. Evans:

The United States Environmental Protection Agency, Region 1 ("EPA"), is issuing AmeriPride Services Inc. ("AmeriPride") this Reporting Requirement ("RR") in order to evaluate the compliance status of certain of AmeriPride's New England facilities with the federal Clean Air Act ("the Act"), 42 U.S.C. § 7401 et. seq., and its implementing regulations. These regulations include, but are not limited to, portions of federally-enforceable state implementation plans for the Commonwealth of Massachusetts (310 Code of Massachusetts Regulations 7.00 et. seq.) and the State of Connecticut (Abatement of Air Pollution Regulations 22a-174 et. seq.), relating to new source preconstruction permitting requirements.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. This letter requires AmeriPride to provide specific information about operations at certain of its New England facilities.

Definitions

"Day" shall mean a calendar day. When any due date herein falls on a weekend or holiday, the due date shall be deemed to be the following business day.

"Date of receipt" shall be the date indicated on the certified mail "green card," or in any other written acknowledgement of receipt of this Reporting Requirement.

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“AmeriPride facility” or “facility” means an AmeriPride place of business in any New England state, engaged at least in part in laundering towels, or that within the past five years has engaged at least in part in laundering towels.

“Hazardous air pollutant” or “HAP” shall be as defined at Section 112(b) of the Clean Air Act, 42 U.S.C. §7412(b).

“Volatile organic compound” or “VOC” shall be as defined at 40 CFR §51.165.

“Potential to emit” or “PTE” shall be as defined at 40 CFR §51.165.

“Towel” means fabric used by commercial or industrial businesses to remove oils, solvents, or other material containing VOCs or HAPs from surfaces, hands, machinery or equipment.

Reporting Requirement

Within 60 days of the date of receipt, AmeriPride is required to provide the following information about each AmeriPride facility in New England (unless otherwise specified), including but not limited to those located at: 490 Wethersfield Avenue in Hartford, Connecticut and 280 Greenwood Street in Worcester, Massachusetts. Where appropriate submit responses in an electronic format consistent with and able to be manipulated by Microsoft Excel. Provide a separate response for each AmeriPride facility.

1. Provide a list of all AmeriPride facilities. Include a brief description of the activities that take place at each facility.
2. Describe each facility’s ownership and business structure:
 - a. Indicate the date and state of incorporation;
 - b. List any partners or corporate officers;
 - c. List any parent and subsidiary corporations;
 - d. Provide the number of employees at the facility;
 - e. Provide the net worth of the entity that owns the facility; and
 - f. Provide the date that AmeriPride began, and if applicable, ceased operations at each facility.
3. Describe the logistics associated with receiving and transporting soiled towels at AmeriPride’s facilities. Specifically:
 - a. Indicate whether soiled towels are picked up at individual customer locations exclusively, or whether AmeriPride uses any drop off centers or other types of collection facilities;
 - b. If drop-off centers or other types of collection facilities are used, specify the location(s) of these facilities;
 - c. Indicate whether pick-ups are scheduled for particular days of the week or take place on an “as needed basis;”
 - d. State how long trucks are typically in transit with each customer’s towels;
 - e. Describe how soiled towels are stored within trucks (e.g., whether solely within

- individual customer bags, or in bags contained within bins, vats, bays or other types of containment); and
- f. Describe the types of bags provided to customers for storage of their soiled towels. In the description, include the capacity of the bags, the material the bags are made of, and explain whether the bags are designed to separate any liquids contained within the soiled towels.
4. Indicate the dates when each facility began, and if applicable, ceased, laundering towels.
 5. Describe any factors or limitations that may affect the facility's "potential to emit" volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the processing of soiled towels. Such factors may include, but are not limited to: the number and capacity of washers and dryers at the facility; the input, output, and storage capacity of the wastewater treatment facility; etc. For each factor, provide the specific (numeric) limitation and provide calculations to demonstrate a restriction on "potential to emit."
 6. Provide copies of analytical results from any and all air emissions testing or internal air monitoring for VOCs or HAPs conducted at any AmeriPride facilities nationwide, including testing results relevant to the development of any facility-specific emission factors.
 7. Provide the following information for the time period between July 1, 2006 and the present in an electronic spreadsheet format:
 - a. The actual quantity (in pounds) of soiled towels received and processed (including laundering and drying) per month and per year. If AmeriPride distinguishes between categories of towels provided to customers in any way (e.g., print towels, garage towels, auto body towels) please provide the summary of towels processed using such categorization;
 - b. A summary of the annual total quantity (in lb) of soiled towels, with specific towel categorization specified, received and processed (including laundering and drying) per year, as summarized by the Standard Industrial Code (SIC code) of AmeriPride's customers. If AmeriPride is not familiar with the applicable SIC code for customer(s), provide a summary of the total quantity of towels processed, by towel type, with a description of the type of industry represented.
 - c. Any and all data describing the VOC and HAP content of the soiled towels, including information about the specific solvents or oils contained on the towels;
 - d. Any and all data or calculations of a dirty to clean weight ratio (e.g. 200 pounds of soiled print towels will result in 100 pounds of clean print towels);
 - e. Monthly and annual VOC and HAP emissions from towel laundering operations (explain the calculation and any assumptions);
 - f. Records of VOC, HAP, and/or hydrocarbon content at any point in the wastewater stream;
 - g. Monthly and annual VOC and HAP emissions from wastewater pretreatment operations (explain the calculation and any assumptions);

- h. Any and all instructions provided to customers regarding how they should store their soiled towels and as well as any restrictions on the solvent content of these towels; and
 - i. Specifications of the load cycle times associated with soiled towels, including the typical weight of a load of towels and wash and drying time for each category of soiled towels processed.
- 8. Provide the following information about the washers and dryers used for laundering towels at each facility:
 - a. Make, model, capacity and any other operational specifications of each washer and dryer;
 - b. Date of purchase of each washer and dryer;
 - c. Date of installation of each washer and dryer;
 - d. Date that each washer or dryer was put into operation;
 - e. Date that each washer or dryer was taken out of service, if applicable; and
 - f. Indication as to whether the washer or dryer was decommissioned from use at any AmeriPride location and placed back into service at another AmeriPride location, including applicable dates of placement and/or removal from service.
- 9. For each facility, indicate whether any additional washer and dryer purchases are anticipated within the next two years, and the anticipated capacity of such units.
- 10. For each facility, list each item of process equipment (e.g. extractors, aeration dryers) and process support equipment (e.g. boilers, compressors) costing above \$10,000 that AmeriPride has purchased since January 1990. Also, for each such piece of equipment, provide the following information:
 - a. The purpose/role of the equipment;
 - b. The cost and date of purchase;
 - c. The date installation was completed, if applicable, or intended date of installation;
 - d. The date the equipment began operating;
 - e. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications; and
 - f. Information pertaining to any emission control devices associated with such process equipment, including the type of emission control device, when such device was installed, and any data pertaining to emission reductions from use of such device.
- 11. Provide a description of the wastewater treatment process at each facility. Provide a diagram of the wastewater treatment operations and include:
 - a. All equipment used for wastewater storage or treatment (specifying the location of the tank, capacity of the tank in gallons or liters, and the type of treatment occurring in the tank or equipment – such as pH adjustment, coagulation/flocculation, etc.);
 - b. Catch basins and trenches used to collect wastewater; and
 - c. Equipment used to extract solvents or other liquids from incoming materials.

12. Provide annual VOC and HAP emissions at each facility since 2006 from:
 - a. All cleaning agents used on-site that contain VOCs (to include chemicals used to clean laundry as well as chemicals used to clean the premises);
 - b. All operational solvents and oils used on-site that contain VOC; and
 - c. All fuel burning equipment.Briefly describe how you performed the calculations.
13. For each facility, for each year from 2006 to present, provide an estimate of the average length of time in days that soiled towels were stored on-site or in trucks locations and at affiliated depot locations. Include copies of supporting information.
14. Indicate whether AmeriPride routinely arranges for the shipment of print towels directly from its New England customers, or from its New England AmeriPride facilities to locations outside of New England for laundering or dry cleaning. Specify what criteria are used by AmeriPride in order to determine whether print towels would be laundered at a New England facility or elsewhere.
15. Provide copies of all correspondence AmeriPride (or any of its predecessors) has had with state and federal environmental agencies regarding air emissions at New England facilities, including copies of:
 - a. All permits issued;
 - b. All permit applications; and
 - c. Any requests for permit modifications.

Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Joan Jouzaitis, Air Technical Unit

and

Robert W. Girard
Assistant Director, Air Enforcement
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

and

John Kronopolus, Compliance and Enforcement Chief
MassDEP Central Regional Office
627 Main Street
Worcester, Massachusetts 01608

Be aware that if AmeriPride does not provide the requested information, EPA may order AmeriPride to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

AmeriPride may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to AmeriPride. Please be aware that states may have different regulations governing the protection of confidential business information.

If you have any questions regarding this reporting requirement, please contact Joan Jouzaitis, Environmental Engineer at (617) 918-1846 or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

cc: Richard Pirollo, CT DEEP